

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

FREEDOM FROM RELIGION FOUNDATION,
INC.; ANNE NICOL GAYLOR; ANNIE LAURIE
GAYLOR; PAUL GAYLOR; DAN BARKER;
PHYLLIS ROSE, and
JILL DEAN,

Plaintiffs,

v.

Case No. 08-CV-588

PRESIDENT BARACK OBAMA; WHITE
HOUSE PRESS SECRETARY ROBERT L.
GIBBS; WISCONSIN GOVERNOR JIM DOYLE;
and SHIRLEY DOBSON, CHAIRMAN OF THE
NATIONAL DAY OF PRAYER TASK FORCE,

Defendants.

WISCONSIN GOVERNOR JIM DOYLE'S MOTION FOR SUMMARY JUDGMENT

Defendant Wisconsin Governor Jim Doyle, by Assistant Attorney General, Thomas C. Bellavia, hereby moves this Court for summary judgment, pursuant to Fed. R. Civ. P. 56. The grounds of this motion are that Plaintiffs lack standing to assert their claims against Governor Doyle and that the challenged actions of Governor Doyle do not violate either the United States Constitution or the Wisconsin Constitution. The factual and legal bases of this motion are more fully set forth in the accompanying Brief in Support of Motion for Summary Judgment by Defendant Wisconsin Governor Jim Doyle, which is being simultaneously filed.

WHEREFORE, defendant Wisconsin Governor Jim Doyle respectfully asks that judgment be entered in his favor denying all of the relief requested against him in this matter and granting him such further relief as the Court deems appropriate.

Dated this 9th day of October, 2009.

J.B. VAN HOLLEN
Attorney General

s/Thomas C. Bellavia
THOMAS C. BELLAVIA
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